

- a. All written discovery completed by August 31, 2022.

b. Fact witness depositions completed by September 30, 2022.

4. Expert Discovery:

a. Plaintiff's expert disclosures pursuant to Fed. R. Civ. P. 26(a)(2) due by September 30, 2022.

b. Defendants' expert disclosures pursuant to Fed. R. Civ. P. 26(a)(2) due by October 31, 2022.

c. Expert depositions must be completed by November 30, 2022.

5. Close of discovery:

All discovery completed by November 30, 2022.

6. Dispositive motions:

a. Dispositive motions, such as motions for summary judgment, partial motions for summary judgment, or motion for judgment on the pleadings must be filed by December 31, 2022.

b. Opposition to dispositive motions due January 15, 2023.

B. Initial Pretrial Conference

To be determined by the Court.

C. Settlement Proposals

Plaintiff intends to provide a written settlement proposal by December 15, 2021.

D. Local Rule 16(d)(3) Certifications

The parties' certifications pursuant to Local Rule 16.1(d)(3) are being filed separately with the Court.

E. Magistrate Judge

The parties do not consent to the reassignment of this case to a magistrate judge for all purposes.

Respectfully submitted,

PLAINTIFF

Elmutaz Osman,

By his Attorneys,

By: /s/ Eric Sommers
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